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January 30, 2025

Via Electronic Filing

The Hon. Taryn A. Merkl, U.S.M.J.
U.S. District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Hernandez v. Happy Street LLC et al*
Case No.: 1:22-cv-06918-DG-TAM

Dear Honorable Magistrate Judge Merkl:

This law firm represents Plaintiff Aaron Hernandez (the “Plaintiff”) in the above-referenced action. This letter is submitted jointly with counsel for Defendants Happy Street LLC, Happy Street Too LLC (together, the “Corporate Defendants”) and Slobodan Radivojevic a/k/a Bob Radivojevic (the “Individual Defendant”, and collectively, the “Defendants”).

Pursuant to the directives contained in Your Honor’s January 24, 2025 Order, the parties are available for a settlement conference, on February 19, 2025.

The parties wish to apologize to the Court for not providing four (4) additional dates and times, as directed in the Court’s January 24, 2025 Order. The undersigned emailed counsel for Defendants on January 28, 2025 at 3:21 p.m., with a proposed draft of the instant letter with multiple proposed dates and times. Since then, counsel met-and-conferred via email and phone call multiple times, to obtain further specificity as to Defendants’ availabilities for a settlement conference. However, as of the date of the submittal of the instant latter, Defendants have only been able to confirm their availabilities for February 19, 2025.

In light of the foregoing, it is respectfully requested that the Court schedule a settlement conference on February 19, 2025.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

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